

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

JOINT MOTION OF ALL PARTIES
FOR ACCEPTANCE OF STIPULATION AND AGREEMENT
TO PLACE POSTAL SERVICE INSTITUTIONAL DISCOVERY
RESPONSES INTO EVIDENCE
(September 24, 2001)

Presiding Officer's Ruling No. C2001-1/11 (August 23, 2001) proposed a procedure by which designated institutional discovery responses furnished by the Postal Service could be placed into evidence. The parties have all found the proposed procedure to be acceptable, and, pursuant to that proposal, hereby request that the following stipulation and agreement be accepted for the purpose of placing designated institutional discovery responses into evidence.

Wherefore, on behalf of all signatory participants, the Postal Service respectfully requests acceptance of the attached Stipulation and Agreement to place into the evidentiary record the designated institutional discovery responses which are identified in the Stipulation and Agreement, and of which two copies are being furnished to the

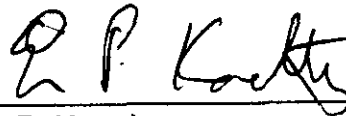
Commission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
Ratemaking



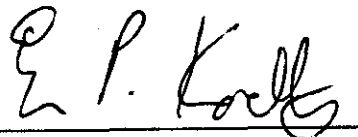
Eric P. Koetting
Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

Douglas F. Carlson
P.O. Box 7868
Santa Cruz CA 95061-7868

David B. Popkin
P.O. Box 528
Englewood NJ 07631-0528



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992/ FAX: -5402
September 24, 2001

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STIPULATION AND AGREEMENT

This Stipulation and Agreement is submitted pursuant to the procedures proposed by Presiding Officer's Ruling No. C2001-1/11 (August 23, 2001). The undersigned participants hereby stipulate and agree to the following:

TERMS AND CONDITIONS

1. This Stipulation and Agreement represents a negotiated agreement to place into the evidentiary record the designated institutional discovery responses submitted by the Postal Service in this proceeding, including all library references incorporated by reference in those responses.

2. The undersigned participants stipulate and agree that the designated responses have been prepared by the Postal Service and submitted as institutional responses to discovery requests. The designated responses, of which two copies are being furnished to the Commission, consist of responses to:

DFC/USPS-1 - 18, 20 - 77

DBP/USPS-1 - 9, 13 - 15, 17, 21 - 22

OCA/USPS-1(a-h), 2, 4 - 5, 8 - 9, 11 - 12, 14

3. The Postal Service attests to the accuracy of the designated

responses, and the other undersigned participants stipulate and agree that, for purposes of this proceeding, they are willing to accept the accuracy of the designated responses to the same extent as would apply if those responses had been adopted as the testimony of a Postal Service witness.

4. The undersigned participants stipulate and agree that they do not object to treating the designated institutional discovery responses as record evidence in this proceeding.

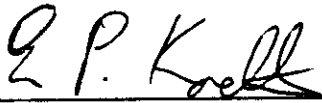
* Signature pages are attached.

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SIGNATURE PAGE FOR STIPULATION AND AGREEMENT



Eric P. Koetting
Attorney, Ratemaking
United States Postal Service

September 24, 2001
Date

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SIGNATURE PAGE FOR STIPULATION AND AGREEMENT

Douglas F. Carlson

September 24, 2001

Name of Participant

Date

Douglas F. Carlson

[Signature of Representative]

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SIGNATURE PAGE FOR STIPULATION AND AGREEMENT

Office of the Consumer Advocate
Name of Participant

Date

9/19/01


Kenneth E. Richardson
[Signature of Representative]

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SIGNATURE PAGE FOR STIPULATION AND AGREEMENT

DAVID B. POPKIN 9/24/2001
Name of Participant Date

[Signature of Representative]